



South Coast
Air Quality Management District

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September 10, 2010

Mr. Rene Avila, Interim Planning Director
City of Perris
101 North D Street
Perris, CA 92570

**Final Environmental Impact Report for the
Proposed Rados Distribution Center**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be considered prior to adopting the Final Environmental Impact Report (Final EIR).

In the Final EIR, the lead agency determined that regional emissions are significant during construction and operation. AQMD staff recognizes that the lead agency has also used a localized air quality analysis and a health risk assessment to determine that the potential impacts from the diesel emissions associated with the proposed project are less than significant. However, AQMD staff is concerned that the cumulative impacts have been underestimated for this warehouse and the many other new warehouses in the City of Perris. This impact may be underreported from an underestimation of total truck trips and from a lack of consideration of truck idling at nearby facilities and on nearby streets. Without considering the impact of these additional significant sources of emissions, the lead agency does not appear to have enough information to determine the significance of air quality and health risk impacts. As some air quality impacts may be underestimated, and others have been found to be significant by the lead agency, AQMD staff strongly recommends that additional feasible mitigation measures be considered to reduce the diesel emissions associated with this project.

The AQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Ian MacMillan, Program Supervisor– CEQA Section, at (909) 396-3244, if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Susan Nakamura".

Susan Nakamura
Planning and Rules Manager

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Control Number

Underestimation of Air Quality Impacts

Truck Trip Rates

AQMD staff is still concerned that the trip rate used by the lead agency of 1.1 trips per thousand square feet of building space is too low for an air quality analysis. Because the trip rates are directly related to the amount of diesel emissions, and subsequent health risks, AQMD staff would like to clarify its comments made during the comment period for the Draft EIR.

The rate of 1.1 cited above was obtained from the *San Bernardino/Riverside County Warehouse/Distribution Center Vehicle Trip Generation Study* prepared by the National Association of Industrial and Office Properties (NAIOP) in 2005. This study was commissioned because some considered the trip rate of 4.96 from the standard trip rate reference (*ITE Manual, 7th Edition*) to be an overestimate for high-cube warehouses. Since the publication of the NAIOP study, the *ITE Manual* has been revised and an 8th edition has been published that considered additional studies, including several from NAIOP. The *ITE Manual 8th Edition* concludes that the average trip rate for high-cube warehouses should be 1.44, approximately 25% higher than the rate used in the Final EIR. At a minimum, this suggests that the emissions for this project may have been underestimated by a minimum of 25%.

AQMD staff notes that even the use of the higher *ITE Manual 8th Edition* rate may not be adequate to evaluate air quality impacts as it is an average rate. AQMD policy and CEQA case law support conducting a reasonable worst case analysis of air quality impacts, thus a more conservative rate should have been used to evaluate the impacts of this project. Analysis by AQMD staff of trip rates from 68 different warehouses indicates that a trip rate of 2.59 per thousand square feet captures 95% of modern high-cube warehouse truck trips. This value is 2.3 times higher than the rate used in the Final EIR. It is important to note that trip rates as high as 5.25 per thousand square feet have been observed in the South Coast Air Basin.

Because the trip rate appears to be significantly underestimated, AQMD staff recommends that the lead agency revise its analysis of air quality and health risk impacts prior to certifying the Final EIR. If impacts are found to be significant after this analysis, additional mitigation measures should be considered to reduce this risk to a less than significant level (see below).

Cumulative Impacts

The lead agency presents an analysis of cumulative health risk from diesel exhaust from over one hundred projects in the nearby area and concludes that the potential carcinogenic risk is 4.2 in one million at the nearest residence. However, the analysis underestimates the impacts on the surrounding community from the operation of current and future distribution centers by neglecting onsite truck activity at the eight recently opened and newly planned warehouses within approximately one mile of the project site (totaling approximately 11.4 million square feet). Truck idling and onsite movements are essential to the function of a warehouse and are a significant source of diesel emissions. Without quantifying this source of emissions, the lead agency does not have enough information to conclude that the project won't cumulatively contribute to significantly

exposing sensitive receptors to substantial pollutant concentrations. AQMD staff continues to recommend that the lead agency conduct a community-wide health risk assessment to determine the potential health impacts from operating so many distribution centers in the city. The results of the HRA should be used to identify action items to target methods to reduce diesel emissions from these operations. Potential measures are discussed below.

Mitigation Measures

Diesel Engine Emission Controls

AQMD staff strongly recommends that the lead agency consider the following additional mitigation measures to address the concerns raised above for all new warehouse projects within its jurisdiction prior to certifying the Final EIR for the Rados Distribution Center. Other lead agencies that abide by similar measures include the City of Banning¹ and the Ports of Los Angeles and Long Beach².

- Beginning in 2012, all heavy duty trucks entering the port property must meet or exceed EPA 2007 engine emission standards
- Beginning in 2015, all heavy duty trucks entering the property must meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025.
- The facility operator will maintain a log of all trucks entering the facility to ensure that on average, the daily truck fleet meets that emission standards listed above. This log should be available for inspection by city staff at any time.
- The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies [for example, by requiring attendance at CARB-approved courses (such as Course #512)].
- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR.

Truck Route Enforcement

The less-than-significant determination made in the Health Risk Assessment (HRA) assumes that trucks will only travel along designated truck routes to get to the project site. AQMD staff is concerned that truck travel outside of these routes was not considered in the HRA and that this may result in an underestimation of potential health risks to nearby sensitive receptors. The lead agency did not specify enforceable measures that will ensure that trucks will only travel along these truck routes. Trucks may travel off of the routes for a number of reasons, such as the need to access trucking support facilities or ignorance of local ordinances. In order to reduce the amount of truck travel outside of designated routes, AQMD staff recommends the following measures:

¹ Banning Business Park MND and Conditions of Approval
<http://banning.ca.us/archives/30/July%2013,%202010%20City%20Council%20Agenda.pdf>

² Clean Trucks Program
<http://www.cleanairactionplan.org/cleantrucks/>

- Provide notification to truck drivers of designated truck routes in the area, including with the use of street signs and brochures available at the project site.
- Provide dedicated monitoring and enforcement of truck routes for the thousands of new trucks that will travel in the surrounding vicinity each day.
- Since the distribution centers in this area will be a regional hub of trucking activity, the lead agency should ensure that trucking support services are located in the immediate area and away from sensitive receptors. This includes repair shops, parts suppliers, restaurants, gas stations, overnight secured parking facilities, lodging, etc. If these ancillary facilities are not located in the immediate vicinity, truckers will be forced to travel off of designated truck routes and will bring diesel emissions into the surrounding community.